

IN THE CIRCUIT COURT OF MARYLAND FOR FREDERICK COUNTY

CAROLYN R. BURDETTE,
Plaintiff

v.

EDWARD J. McCARTHY, JR., et al.,
Defendants

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Civil No. 2639E

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MOTION FOR ORDER TO
FORECLOSE RIGHTS OF REDEMPTION

Comes now the Plaintiff, Carolyn R. Burdette, by her attorney, Paul B. Handy, and moves for an Order to foreclose the rights of redemption of all Defendants to this action, and for reasons states as follows:

1. Plaintiff has now effected personal service of the Summons and Complaint on each Defendant by certified mail, with the exception of Edward J. McCarthy, Jr., who died before service could be obtained. In addition, Plaintiff has caused the Notice of Publication to be published in the Frederick News-Post, pursuant to order of this Honorable Court, on November 22, and 29, and December 6 and 13, 1986, and on April 9, 16 and 23, 1987. The Court is respectfully referred to the Affidavit of Service and its Attachments, incorporated herein by reference.

2. Plaintiff has now complied with all requirements under Maryland law and directed by this Honorable Court, to give notice of these proceedings to all Defendants. The Defendants, Edward J. McCarthy, Jr., and Estate of Edward J.

LAW OFFICES
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